

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: DIISOCYANATES ANTITRUST  
LITIGATION

This Document Relates to:  
All Cases

Master Docket Misc. No. 18-1001

MDL No. 2862

Judge W. Scott Hardy

**PLAINTIFFS' PROPOSED CASE MANAGEMENT ORDER**

<b>Event</b>	<b>Deadline</b>
Oral Argument on Rule 12(b)(2) Foreign Defendants' <sup>1</sup> Motions To Dismiss <sup>2</sup>	April 22, 2025 (completed)
Substantial Completion of Document Production by Any Rule 12(b)(2) Foreign Defendant Whose Motion To Dismiss Is Denied	September 15, 2025, or 119 days before close of all fact discovery
Supplemental Interrogatory Responses by Plaintiffs and Defendants	October 14, 2025, or 90 days before close of all fact discovery
Close of Fact Discovery <sup>3</sup>	January 12, 2026
Plaintiffs' Opening Expert Reports (class certification and merits)	February 26, 2026, or 45 days after close of all fact discovery

<sup>1</sup> The Rule 12(b)(2) Foreign Defendants are Covestro AG and Wanhua Chemical Group Co., Ltd. The Non-12(b)(2) Defendants are BASF Corporation, BASF SE, Covestro LLC, The Dow Chemical Company, Huntsman Corporation, Huntsman International LLC, and Wanhua Chemical (America) Co., Ltd.

<sup>2</sup> In the event the Court denies either of the Rule 12(b)(2) Foreign Defendant's pending Motions To Dismiss, the parties shall within 30 days of that denial submit a joint proposed supplemental case management schedule or competing proposed supplemental case management schedules to address whether any changes should be made to this CMO.

<sup>3</sup> During fact discovery, the parties may take one (1) deposition of each witness, absent good cause. The parties, however, may seek leave of court to redepose the same individual (within 45 days after the Rule 12(b)(2) Foreign Defendants' document production), and in so doing must specifically identify the individual(s) that they want to redepose, the extremely limited nature of the deposition, and the specific reasons they could not have questioned this individual previously about the topics sought.

<b>Event</b>	<b>Deadline</b>
Defendants' Depositions of Plaintiffs' Opening Experts	March 27, 2026, or 74 days after close of all fact discovery
Defendants' Expert Reports (class certification and merits)	April 13, 2026, or 91 days after close of all fact discovery
Plaintiffs' Depositions of Defendants' Experts	May 12, 2026, or 120 days after close of all fact discovery
Plaintiffs' Rebuttal Expert Reports (class certification and merits)	May 27, 2026, or 135 days after close of all fact discovery
Defendants' Depositions of Plaintiffs' Rebuttal Experts	June 26, 2026, or 165 days after close of all fact discovery
Motion for Class Certification, Motion(s) for Summary Judgment, and Motions Pursuant to Federal Rules of Evidence 702 and 703	July 27, 2026, or 196 days after close of all fact discovery
Responses to Class Certification, Motion(s) for Summary Judgment, and Motions Pursuant to Federal Rules of Evidence 702 and 703	September 24, 2026 or 255 days after close of all fact discovery
Reply Briefs in Support of Motion for Class Certification, Motion(s) for Summary Judgment, and Motions Pursuant to Federal Rules of Evidence 702 and 703	October 26, 2026, or 287 days after close of all fact discovery

**SO ORDERED.**

Dated: \_\_\_\_\_, 2025

**BY THE COURT:**

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 Judge W. Scott Hardy  
 United States District Judge